

Exhibit D

AFFIDAVIT OF TODD BONTECOU

STATE OF IDAHO)
) ss.
COUNTY OF TETON)

The affiant, Todd Bontecou, being duly sworn, states as follows:

1. I am over the age of 21 years and am competent to and do state the facts and matters contained in this affidavit are true and based upon my personal knowledge.
2. I was retained by Meyer, Shaffer & Stepan to investigate, *inter alia*, child sexual abuse committed by officials of the Hardin Congregation of Jehovah Witnesses, including Bruce Mapley Sr.
3. As part of my investigation, on or around May 23, 2019 I found a telephone number, 205-681-1387, that was associated with Bruce Mapley Sr's wife Charolette Mapley while conducting a search through the TLO database. From my online research including social media I understood that Mr. Mapley lived in Alabama and the area code of the phone number I called was an Alabama area code.
4. On or about May 24, 2019, I called that number from my office phone in Jackson, Wyoming. The person who answered identified themselves as Charlotte. I asked if Bruce Mapley was available, and Charlotte said yes and she put him on the phone. I then had an approximately 15-minute conversation with Bruce Mapley.
5. A true and accurate recording of that conversation was provided to Meyer, Shaffer & Stepan.
6. Further affiant sayeth not.

Paul Bonten

Todd Bontecou

Subscribed and sworn to before me this 10th day of August, 2022.

E. M. Walker

Notary Public

My Commission Expires: 11/22/27